# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 18-13469

Todd D. Polin : Chapter 13

Heather E Polin : Judge Eric L. Frank

\* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

**Debtor(s)** 

:

Wells Fargo Bank, N.A., d/b/a Wells : Date and Time of Hearing

Fargo Auto : Place of Hearing

Movant, : October 29, 2019 at 9:30 a.m.

: U.S. Bankruptcy Court

Todd D. Polin : 900 Market Street, Courtroom #1

Heather E Polin : Philadelphia, PA, 19107

:

William C. Miller

VS

Respondents.

## NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto has filed a Motion for Relief from the Automatic Stay to permit Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto to Repossess 2012 Kia Sorento VIN# 5XYKT3A14CG256553:

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before October 18, 2019, you or your attorney must do **ALL** of the following:
  - A. File an answer explaining your position at:

#### Clerk, U.S. Bankruptcy Court

U.S. Bankruptcy Court 900 Market Street Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee Office of the U.S. Trustee 200 Chestnut Street, Suite 502 Philadelphia, PA 19106

William C. Miller P.O. Box 1229 Philadelphia, PA 19105 ecfemails@ph13trustee.com

Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on October 29, 2019 at 9:30 a.m. in U.S. Bankruptcy Court, 900 Market Street, Courtroom #1, Philadelphia, PA, 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: October 3, 2019

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Case No.: 18-13469

Todd D. Polin : Chapter 13

Heather E Polin : Judge Eric L. Frank

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Heather E Polin : Philadelphia, PA, 19107

:

William C. Miller

VS

Respondents.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Motion, Response Deadline, and Hearing Date regarding the Motion for Relief from the Automatic Stay to permit Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto to Repossess 2012 Kia Sorento VIN# 5XYKT3A14CG256553 was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 200 Chestnut Street, Suite 502, Philadelphia, PA 19107

William C. Miller, Esq., Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Brad J. Sadek, Attorney for Todd D. Polin and Heather E Polin, Sadek and Cooper, 1315 Walnut Street, Suite 502, Philadelphia, PA 19107, brad@sadeklaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on October <u>3</u>, 2019:

Todd D. Polin and Heather E Polin, 328 N. Penn Street, Hatboro, PA 19040

Todd Daniel Polin, 328 N Penn St, Hatboro, PA 19040

DATE: October 3, 2019

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181 Attorneys for Creditor

The case attorney for this file is Karina

Velter.

Contact email is kvelter@manleydeas.com